



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

June 5, 2025

By ECF

The Honorable Valerie Figueredo
United States Magistrate Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Marcia Edwards v. Kristi Noem*, No. 23 Civ. 6942 (VF)

Dear Judge Figueredo:

This Office represents defendant Kristi Noem, Secretary of the Department of Homeland Security (the “Government”)¹ in the above-referenced action brought pursuant to Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e *et seq.* We write to respectfully request a 30-day extension of the Government’s deadline to file its anticipated motion for summary judgment, from June 10, 2025, to July 10, 2025, and a corresponding 30-day extension of the ensuing dates in the summary judgment briefing schedule. *See* Dkt. No. 45.

The reason for this request is that the parties only received deposition transcripts for four of the five depositions that were taken in this case recently, and the time for those deponents to review the transcripts and make any necessary changes proscribed by Federal Rule of Civil Procedure 30(e) has not yet expired. The Government requires the requested additional time will allow deponents to review their transcripts and provide any corrections. The Government will also use this time to obtain any necessary declarations in support of its summary judgment motion.

This would be the first extension of this deadline. Plaintiff consents to the Government’s request. If an extension is granted, the new briefing schedule would proceed as follows:

- **Government’s Motion for Summary Judgment:** July 10, 2025
- **Plaintiff’s Opposition to the Government’s Motion for Summary Judgment and any Cross-Motion:** August 11, 2025
- **Government’s Reply in Support of its Motion for Summary Judgment and Opposition to any Cross-Motion:** August 25, 2025
- **Plaintiff’s Reply in Support of any Cross-Motion:** September 8, 2025

¹ Pursuant to Federal Rule of Civil Procedure 25(d)(1), the Secretary of the Department of Homeland Security, Kristi Noem, is automatically substituted for the former Secretary of the Department of Homeland Security, Alejandro Mayorkas.

I thank the Court for its consideration of this letter.

Respectfully,

JAY CLAYTON
United States Attorney for the
Southern District of New York

By: /s/ Danielle J. Marryshow
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cc: Counsel of record (via ECF)

MEMO ENDORSED



HON. VALERIE FIGUEREDO
UNITED STATES MAGISTRATE JUDGE

Dated: 6/6/25

The Court hereby adopts the briefing schedule proposed herein.
The Clerk of Court is respectfully directed to terminate the
motion at ECF No. 48.